

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES E. BROWN,

Civil Action No. 1:CV-00-1224

Plaintiff

vs.

COUNTY OF SCHUYLKILL,
SCHUYLKILL COUNTY PRISON
SCHUYLKILL COUNTY PRISON
BOARD MEMBERS,
FRANCIS V. McANDREW,
FORREST L. SHADLE,
JEROME P. KNOWLES,
STANLEY H. TOBASH,
DAVID J. KURTZ,
GERALD BRITTON,
EUGENE BERDANIER,
WILLIAM E. BALDWIN,
and ANTHONY KANKOWSKI,

Defendants

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FILED
SCRANTON

MAR 12 2001

PER _____
DEPUTY CLERK

AFFIDAVIT OF WILLIAM E. BALDWIN
IN SUPPORT OF MOTION OF DEFENDANTS,
COUNTY OF SCHUYLKILL, ET AL., TO DISMISS THE COMPLAINT
OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT

COMMONWEALTH OF PENNSYLVANIA:

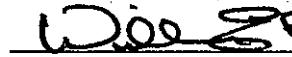
: ss.
COUNTY OF SCHUYLKILL

William E. Baldwin being duly sworn according to law, deposes and says that:

1. He is the President Judge of the Court of Common Pleas of Schuylkill County and serves as Chairman of the Schuylkill County Prison Board.
2. The Schuylkill County Prison Board is composed of the County Commissioners, District Attorney, Sheriff and meets once a month at the Schuylkill County Courthouse.
3. The Schuylkill County Prison Board is responsible for setting and establishing general policies and procedures with regard to the Schuylkill County Prison

but is not involved to any extent in the day-to-day operations or administrations of the prison.

4. I have reviewed the Complaint filed by the plaintiff, Charles E. Brown and in conjunction with that Complaint, have reviewed all correspondence and communication addressed to the Prison Board. My investigation reveals that there is no documentation of any contact or communication by or on behalf of the plaintiff, Charles E. Brown, and the Prison Board relative to any of the allegations set forth in his Complaint.


William E. Baldwin

Sworn and subscribed to before :

me, a Notary Public, this 8th :

day of March, 2001.

D. Susan Kost

NOTARY PUBLIC

